

Exhibit 7



Upper Delaware Council

P.O. Box 192, 211 Bridge Street, Narrowsburg, New York 12764-0192 • (Tel.) 845-252-3022 • (Fax) 845-252-3359
www.upperdelawarecouncil.org

June 23, 2023

Heather Gerling, Architectural Historian
Pennsylvania Department of Transportation
c/o PennDOT District 4
55 Keystone Industrial Park
Dunmore, PA 18512-1516
Sent via email: hgerling@pa.gov

RE: Skinners Falls Bridge SHPO Review # 2013PR14303 June 25, 2023 Comment Deadline

Dear Ms. Gerling,

As a Skinners Falls, NY-Milanville, PA Bridge Project Advisory Committee member and Section 106 Consulting Party, the Upper Delaware Council (UDC) has reviewed the Historic Bridge Rehabilitation Analysis (HBRA) Phase 1 report issued in May 2023.

We are strongly encouraged by the findings that the Skinners Falls Bridge **CAN** be rehabilitated while still retaining its character-defining features per the Secretary of the Interior's Standards for Rehabilitation. We appreciate the recognition that the 1902 structure has "exceptional" historic significance. That is clearly reflected by its qualification for a 1988 listing on the National Register of Historic Places under the Engineering criterion as a rare example of an intact multiple span Baltimore truss bridge of moderate length. The bridge is also a contributing resource to the Milanville, PA Historic District, listed nationally since 1993. Further, the National Park Service cites the bridge as an important element of the Upper Delaware Scenic and Recreational River's Outstandingly Remarkable Values.

After anticipating that repairs of the bridge to a 4-ton (current), 7-ton, or 10-ton postings would result in a "no adverse effects" determination since they would not change the appearance, size and scale of the bridge, the HBRA estimates those respective costs at \$15,595,000; \$15,664,000, and \$17,269,000. The first two options cite a 10-15-year design life, while the third proposal could yield a 25-year design life.

The Phase 1 report's conclusion states, "Overall, the task of rehabilitating the Skinners Falls Bridge to a 10-ton weight limit does not include significantly more work than the minimum rehabilitation option. Since all rehabilitation options at a minimum include the sizeable task of replacing the floor system to extend the structure's life, the additional work in this alternative does not yield a significant increase in cost between the minimum and 7-ton weight limit alternatives. The positive outcomes of the 10-ton weight limit rehabilitation alternative include increased structural capacity of the bridge."

Since the bridge was posted at 9-tons from its original construction until 2007, the ability to increase its functionality to 10 tons while retaining its existing alignment, historic characteristics, and unique ornamentation, is a winning prospect.

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It is unfortunate that this interstate bridge's closure to all vehicular and pedestrian traffic since October 16, 2019 continues to drag on during this prolonged Planning and Environmental Linkages Study, with no firm timetable in place to conclude the next steps of the NEPA review that will include a Phase 2 Historic Bridge Rehabilitation Analysis.

We trust that public involvement will be actively considered once the design build alternatives are selected for evaluation. The statistical analysis of transportation needs by your agencies must be coupled with hearing the needs of the people that this bridge serves for business, recreation, historic attraction, community connections, emergency services, and a source of rural pride.

The UDC reiterates its long-standing support for preservation of the Skinners Falls-Milanville Bridge and opposition to any alternative to eliminate this crossing or replace this historic treasure with a conventional modern concrete bridge that would be misplaced and lacking in character.

Thank you for this opportunity to comment.

Sincerely,

Laurie Ramie. Executive Director

(845) 252-3022 or laurie@upperdelawarecouncil.org

Cc: Lisa Brozey, Project Manager, AECOM
Richard Roman, PennDOT Transportation District 4 Executive
James Rusak, NYS DOT Region 9 Regional Director
Joe Canfield, Steve Adams, Scott Rutledge, Damascus Township Board of Supervisors
Gary Maas, Town of Cochection Supervisor
Brian Smith, Wayne County Commissioners Chairman
Robert Doherty, Sullivan County Legislature Chairman, District 1
Craig Rickard, Wayne County Planning Department Director
Heather Brown, Acting Sullivan County Planning Commissioner
PA Senator Lisa Baker, 20th District
NYS Senator Peter Oberacker, 51st District
PA Representative Joe Adams, 139th District
NYS Assemblywoman Aileen Gunther, 100th District
Lindsey Kurnath, NPS Upper Delaware Scenic and Recreational River Superintendent



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May 2, 2024

Amy Lolli, Project Manager, Assistant Liaison Engineer
Pennsylvania Department of Transportation
Engineering District Office 4-0
55 Keystone Industrial Park
Dunmore, PA 18512-1516
Via email: skimmersfallsbridge@aecom.com

RE: Skinners Falls, NY-Milanville, PA Bridge Comments due by May 26, 2024

Dear Ms. Lolli,

After reviewing the draft Planning and Environmental Linkages (PEL) Study for Interstate Bridge #5 connecting Damascus Township, PA and the Town of Cohecton, NY dated April 8, 2024, attending the April 25 public meeting, and participating on the Project Advisory Committee since its 2021 initiation, the Upper Delaware Council, Inc. (UDC) reiterates our unwavering support for traditional rehabilitation of the existing 1902 bridge.

We also call for an acceleration of the protracted study period since the bridge's October 2019 closure to mitigate against its further deterioration and escalating construction costs. We are mindful of the required evaluation process to comply with the National Environmental Policy Act and the National Historic Preservation Act Section 106, but see no actual timelines offered in the draft study other than references to "future phases" and "further investigation."

The report provides thoroughly researched documentation. However, after investing 4-1/2 years and \$3,692,500 in New York-Pennsylvania Joint Interstate Bridge Commission study allocations through 2023, no alternative has been selected.

The UDC advocates to advance the findings of the Historic Bridge Rehabilitation Analysis (Phase 1 released in May 2023) that rehabilitation to a 10-ton weight limit would comply with the Secretary of the Interior's Standards for Rehabilitation by strengthening its engineering function while retaining the bridge's distinctive truss configurations, appearance, and historic character. That position was previously substantiated in a 2013 Structural Assessment and 2014 Feasibility Study for the Skinners Falls-Milanville Bridge.

In recognizing the financial challenges of the traditional rehabilitation alternative (\$16.9-\$19.1 million in estimated construction costs variously for a 4, 7, or 10 ton posting compared to full replacement ranging from \$11.5-\$26.5 million), those costs could be managed by eliminating cited "enhancements" such as installation of traffic signals and a dry hydrant which never existed previously on the rural bridge. Also, the preliminary scan of potential funding sources to address budget limitations could be expanded to include the Federal Infrastructure Investment and Jobs

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Act, the Delaware Watershed Conservation Fund administered through the National Fish and Wildlife Foundation, and historic preservation sources that value saving unique structures.

The PEL Questionnaire completed by PennDOT in the report's appendix asks, "Are there any other issues a future project team should be aware of?" The response: "There is potential controversy associated with this project, especially as it pertains to build options which do not result in the preservation of the existing historic bridge." The report reveals that public surveys and submitted comments dating back to 2021 overwhelmingly favor the bridge's restoration.

The reason is that this 466.6-foot, single lane, timber deck bridge built in 1902 by the American Bridge Co. fits perfectly into its rural setting, helps define the Upper Delaware Scenic and Recreational River's Outstandingly Remarkable Cultural Values, and serves as a treasured, picturesque attraction for this special region's 250,000+ annual visitors and local residents alike.

The pin-connected Baltimore through truss design is historically and technologically significant, earning a November 14, 1988 designation to the National Register of Historic Places. The Pennsylvania State Historic Preservation Office rates the historic preservation priority level of this bridge as "exceptional" because it is one of only three intact examples of this type of truss bridge remaining in the Commonwealth that hasn't been demolished. The bridge is featured on the "Historic and Architectural Resources of the Upper Delaware River Valley: New York and Pennsylvania" 1992 Multiple Property National Register listing, as had been the 1904 Pond Eddy Bridge before that was torn down after a 20-year controversial debate and replaced with a two-lane concrete bridge in 2018. In 1993, the Milanville Historic District was added to the Register in recognition of the area's 19th and early 20th century industrial development and noteworthy architecture which prominently includes the bridge among its 14 contributing structures.

A precedent for the NY-PA Joint Interstate Bridge Commission supporting the preservation of a single-lane Upper Delaware River crossing is found upstream at the Kellams, NY-Stalker, PA Bridge, originally built in 1890 with major rehabilitations occurring in 1990 and 2018. The 384-foot suspension bridge serves a similar traffic count of approximately 300 vehicles per day, is deemed suitable for its rural location, and carries an 11-ton limit.

A 10-ton posted Skinners Falls Bridge would adequately fulfill the transportation needs of the communities it connects. Standard cars (1.5 tons), personal trucks (3 tons), ambulances (5-7 tons), and delivery trucks (6-8 tons) could all be accommodated. The gross weight of National Park Service river patrol vehicles is 4.5 tons. The types of vehicles that could not cross – buses, fire trucks, and tractor trailers – are not appropriate or necessary given that there are alternative crossings offered at short distances away in Narrowsburg and Cohecton via NYS Route 97, most firefighters here respond directly to emergency scenes in their personal vehicles, and there is no major commercial industry to travel to on either side.

Building a two-lane modern bridge would require negotiations to acquire additional property or taking of land by eminent domain. Even so, the new bridge would lead to River Road in Milanville which is weight posted for 10 tons, characterized by narrow, twisty lanes, has endured slope failures, and the approach lacks a proper turning radius for larger vehicles.

The activities associated with the bridge's use meld with our countryside daily living and recreational pursuits that are disrupted by its closure, such as people crossing it for work, shopping, day care, church, scenic drives, and visits to the circa 1850 Milanville General Store, the National Park Service Milanville Ranger Office, the NYS DEC Skinners Falls River Access, Lander's River Trips Skinners Falls Campground, and Lou's Tubes.

Numerous petition drives, the March 30, 2021 virtual public meeting attended by nearly 150 people who articulated the importance of this bridge in their lives and the adverse impacts of its closure, and the literal chants of banner-bearing advocates to “Save the Skinners Falls Bridge” at the April 25 video and poster display session (which did not provide the valuable opportunity for the audience to ask questions and hear answers collectively) attest to this sentiment.

Key issues expressed are the historic value, visual context, emergency response, economic importance, environmental impacts, and long-term functionality of this vital crossing. The PEL planning study documents the engineering, lifecycle maintenance, and cost considerations as well to assess the alternatives of No Build-Do Nothing, Traditional Rehabilitation to 4, 7, or 10 Tons, Non-SOI Compliant Rehabilitation, or Full Replacement.

The UDC’s voting membership is comprised of 13 towns and townships, the Commonwealth of Pennsylvania, and the State of New York who work in partnership with our federal partners at the National Park Service to conserve the 1978 Congressionally designated Upper Delaware Scenic and Recreational River. The Delaware River Basin Commission is a non-voting member.

Lastly, please note that the Final 1986 *River Management Plan for the Upper Delaware Scenic and Recreational River: New York and Pennsylvania* stipulates that facilities in the river corridor to be constructed or operated by government agencies must be reviewed by the UDC as Class II development projects for their substantial conformance with the Land and Water Use Guidelines under the terms of our Cooperative Agreement with the National Park Service.

Sincerely,



Virginia S. Dudko,
UDC Chairperson

Cc: Lisa Brozey, AECOM Project Manager
Richard Roman, PennDOT Transportation District 4 Executive
James Rusak, NYS DOT Region 9 Regional Director
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Joe Canfield, Steve Adams, Scott Rutledge, Damascus Township Board of Supervisors
Gary Maas, Town of Cohecton Supervisor
Brian Smith, Wayne County Commissioners Chairman
Nadia Rajs, Sullivan County Legislature Chairperson, District 2
Craig Rickard, Wayne County Planning Department Director
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PA Senator Lisa Baker, 20th District
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PA Representative Joseph Adams, 139th District
NYS Assemblywoman Aileen Gunther, 100th District
U.S. Congressman Matt Cartwright, PA-8th District
U.S. Congressman Marc Molinaro, NY-19th District
Lindsey Kurnath, NPS Upper Delaware Scenic and Recreational River Superintendent
Carly Marshall, NPS UDSRR Community Planner